



SATURN



Wilmington Assembly Plant

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

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Environmental
Privileged Information

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SCOPE:

The scope of the Environmental Management System (EMS) of Saturn of Wilmington Assembly Plant encompasses the facility's activities. These activities include but not limited to welding, painting, and assembly of mid-size cars; general maintenance; and wastewater pretreatment.

MISSION:

Saturn of Wilmington's mission is to make

Continual Improvement

Reduce Waste

Obey the Laws

Prevent Pollution

A principle the facility utilizes everyday in all activities.

EMS MANUAL APPROVAL:

The EMS manual, flowcharts and procedures that compose the EMS at Saturn of Wilmington Assembly Plant has been reviewed and approved by Top Management. Approval documentation is maintained in the Environmental Department.

| | | | |
|-------|-------|---------------|-------|
| _____ | _____ | _____ | _____ |
| EMR | Date | Plant Manager | Date |

Revisions:

Revisions of this manual will be completed by the Environmental Management Representative or designee and updated on the electronic file. Other revisions to this manual are prohibited. Document Control of printed copies of this manual or portions thereof are clearly identified by the following statement found in the footer.

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Revisions to this document are detailed in the Revision Log found on page 5.

Distribution:

The electronic file that resides on the facility's Intranet and is addressed as follows:

<http://sawmap3.wil.lad.gmeds.com/ISO14001/ISO14001index.htm>

It is accessible electronically in all areas where required throughout the plant.

REVISION LOG:

| Revision Number | Date | Section | Description |
|-----------------|-----------|---------|--|
| 1 | 3/22/2000 | All | Changes made throughout manual to provide clarity and direction to Plant EMS. |
| 2 | 5/4/2000 | All | Changes made throughout manual to provide clarity and direction to Plant EMS and to bring manual into line with recent system updates. |
| | | | |

4.1 GENERAL REQUIREMENTS:

Saturn of Wilmington Assembly Plant has an established, documented and maintained Environmental Management System (EMS) that conforms to the specifications and requirements of ANSI/ISO 14001 - 1996.

Information regarding the individual requirements of the international standard are included in this EMS Manual and GM-specific requirements.

4.2 ENVIRONMENTAL POLICY:

The Saturn of Wilmington Assembly Plant's top management has approved an environmental policy that is appropriate to the environmental impacts of our products, activities and services and is consistent with the policies of the corporation.

This policy establishes the framework for setting environmental objectives and targets. It includes a commitment to continual improvement and the prevention of pollution. It also includes a commitment to comply with relevant environmental legislation and regulations and with GM-specific requirements.

The policy is documented and communicated internally to all employees via methods described in the communications procedure. The environmental policy is posted throughout the facility and will be made available to the public upon request. It is reviewed annually or upon significant process or product changes.

Document Reference:

Saturn of Wilmington Assembly Plant's Environmental Policy
Objectives and Targets EP433.0001
Internal and External Communications EP443.0001



SATURN



Wilmington Assembly Plant

Environmental Policy

As a responsible corporate citizen, Saturn Wilmington Assembly Plant, is dedicated to protecting human health, natural resources and the local and global environment, in accordance with the Environmental Principles of General Motors Corporation. This dedication reaches further than compliance with the law to encompass the integration of sound environmental practices into our business decisions. This Policy is based on the integration of risk-based cost-effective management practices into site activities with the aim of continually improving environmental performance.

The site is committed to assess the environmental impacts of its activities and products to base its environmental management programs, and to reduce these impacts through the establishment of appropriate objectives and targets.

In particular, Saturn Wilmington Assembly Plant, will strive to achieve the following objectives through continued execution of our Environmental Management System (EMS)

1. Comply with all applicable environmental laws and regulations, and other requirements.
2. Assign management responsibility for the environment in all areas of the facility and ensure that all employees are aware of their individual responsibilities for acting in accordance with this policy, while providing effective information and training to encourage individuals to contribute effectively.
3. Practice effective pollution prevention in accordance with a hierarchy giving top priority to waste prevention at the source, elimination or reduction of wasteful practices, and recycling.
4. Maintain good communications with our local community and cooperate with legislators, regulators and other organizations with an interest in our environmental performance.

In accordance with our Environmental Management System (EMS) requirements, the site's objectives and targets will be reviewed periodically to assess progress toward continual improvement. This policy statement will be made available to all Saturn of Wilmington employees and the public.

Date: JUNE 29, 1999

Revised Date: February 28, 2000

Harvey Thomas, Plant Manager

Date

4.3 PLANNING:

4.3.1 Environmental Aspects:

The Wilmington Assembly Plant has a procedure that documents the method and responsibility to identify the environmental aspects of our activities, products and services. The procedure defines the process we use to select those environmental aspects that we can control or over which we expect to have influence and defines the process for selecting significant aspects using disciplined and objective methods for evaluating environmental impacts. These significant environmental aspects are considered when setting environmental objectives and targets.

Wilmington Assembly Plant shall keep information concerning environmental aspects up-to-date.

Document References:

Environmental Aspects EP431.0001

Capturing Changes That Could Impact the Environment EP446.0001

Objectives and Targets EP433.0001

4.3.2 Legal and Other Requirements:

Wilmington Assembly Plant has a procedure that documents the method and responsibility to identify and ensure access to applicable legislative, regulatory and corporate specific requirements that apply to the site's environmental aspects. All applicable environmental legal and other requirements will be identified. This information shall be kept up-to-date.

Document References:

Legal and Other Requirements EP432.0001

Capturing Changes That Could Impact the Environment EP446.0001

4.3.3 Objectives and Targets:

Wilmington Assembly Plant has a procedure that documents the method and responsibility to set and maintain documented environmental objectives and targets, in all relevant functions within the organization, for significant environmental aspects, legal, and GM-specific requirements. Objectives and targets are documented.

When establishing and reviewing the plant's objectives and targets the following items shall be considered: legal and other requirements; significant environmental aspects; technological options; financial, operational, and business requirements; and the views of interested parties.

The objectives and targets are reviewed at least annually by top management to ensure that they remain consistent with the environmental policy and our commitment to the prevention of pollution. When it is found that there is a change in the facility's chemical usage, equipment or facility design, appropriate amendments, modifications or revisions will be made to objectives and targets.

Document References:

Saturn of Wilmington Assembly Plant's Environmental Policy

Environmental Aspects EP431.0001

Legal and Other Requirements EP432.0001

Objectives and Targets EP433.0001

Structure and Responsibility EP441.0001

Capturing Changes That Could Impact the Environment EP446.0001

4.3.4 Environmental Management Program(s):

Wilmington Assembly Plant has a procedure that documents the methods and responsibility to achieve environmental objectives and targets at each relevant function and level of the organization. Action plans (the means) and the time frame for achieving the objectives and targets are documented and communicated on the web page.

The Action Plans are reviewed and revised, as required, to account for any new developments and any new or modified activities, products, or services. Action Plans are also reviewed annually by the Operational Staff to ensure that they remain focused on achieving our objectives and targets.

Document References:

Objectives and Targets EP433.0001

Environmental Management Programs EP434.0001

Structure and Responsibility EP441.0001

Capturing Changes That Could Impact the Environment EP446.0001

EMS Management Review EP460.0001

4.4 IMPLEMENTATION AND OPERATION:

4.4.1 Structure and Responsibility:

Wilmington Assembly Plant has a procedure that documents the method and responsibility to define, document and communicate authorities, roles and responsibilities for operating the EMS. The Operational Staff provides the necessary resources to implement and maintain the EMS.

The Operational Staff has appointed the Senior Environmental Engineer John Peronti as Environmental Management Representative (EMR) responsible for conformance with ISO 14001 and GM-specific requirements and reporting to them on the performance of the system.

Document References:

Structure and Responsibility EP441.0001

4.4.2 Training, Awareness and Competence:

Each department at Wilmington Assembly Plant establishes, documents and maintains the environmental training process to effectively meet the needs of individuals whose job may cause significant environmental impact(s). This system ensures that employees performing specific assignments are qualified on the basis of appropriate education, training, and/or experience. When the Training Department gives training, the appropriate training records are maintained through the use of CTIS and other appropriate methodologies. When the supervisor gives the training, the supervisor will maintain the appropriate training records according to the department's preferred method.

A Training Needs Analysis, a form of department training needs survey, will be used to determine job instruction training for all personnel. All employees and permanent onsite contractors will be provided with ISO 14001 General Awareness Training. The department steering committees with help from the Environmental Department will determine any additional training for all employees at each relevant function and level, as it relates to the site's EMS. These training needs are documented on the Plant-Wide Training Needs Analysis. This may require training based on a legal requirement or training on job instructions that relate to the employee's job.

The ISO 14001 General Awareness Training provides employees with information regarding their job function as it relates to the site's Environmental Policy. Potential consequences to the environment of departure from plant procedures, environmental benefits of improved personal performance and their roles and responsibilities with respect to significant environmental impacts of their job function. Emergency preparedness and response is also included in the ISO 14001 General Awareness Training.

Document References:

Saturn of Wilmington Assembly Plant Environmental Policy

Legal and Other Requirements EP432.0001

EMS Training EP442.0001

Visitor and Contractor Management EP446.0002
Emergency Preparedness and Response EP447.0001

4.4.3 Communication:

Internal communications, with respect to EMS activities and environmental issues will be administered through existing communications at the site. (i.e. Newsletter, Communication packages, etc.) Employee concerns, observations, or comments will be addressed and documented. Visitor / Visitor Contractors will be communicated ISO 14001 requirements that apply to them.

When external communications from interested parties are received, they will be addressed on an individual basis. The proper steps will be followed to determine the appropriate response to the external party. This information will be documented.

The Environmental Management Representative will consult with the Operational Staff at least annually to determine the plant's decision to externally communicate the facility's significant environmental aspects. This decision will be documented.

Document References:

Environmental Aspects EP431.0001
Structure and Responsibility EP441.0001
Internal and External Communications EP443.0001
Visitor and Contractor Management EP446.0002
EMS Management Review EP460.0001

4.4.4 EMS Documentation:

This manual provides a blueprint and a general understanding of the relationships within the Saturn of Wilmington Assembly Plant's Environmental Management System and to provide general direction to the documentation of the EMS that address the elements of the standard.

4.4.5 Document Control:

Wilmington Assembly Plant will establish and maintain a procedure for the site to control all documents in the manner in which they can be located, reviewed, revised as necessary and approved. Current versions of documents are found on the Master List of Controlled Documents on the ISO 14001 Web Site. Obsolete documents are promptly removed, or appropriately labeled for retention of knowledge or legal purposes. The site's document control also requires for documentation to be legible,

dated, readily identifiable, maintained in an orderly manner and retained for a specified period.

Documents including but not limited to procedures, job instructions, visual aids and forms are reviewed, revised as necessary and approved for adequacy by authorized personnel prior to use. A document control procedure identifying the current revision date of documents is established to preclude the use of invalid and/or obsolete documents.

This control ensures that:

- a) the current versions of appropriate documents are available at locations where operations essential to the effective functioning of the EMS are performed;
- b) invalid and/or obsolete documents are removed from points of issue or use, or otherwise assured against unintended use; and
- c) any obsolete documents that are retained for legal and/or knowledge preservation purposes are suitably identified.

Changes to documents are reviewed and approved by the same functions or their designees that performed the original review and approval, unless designated otherwise. The designated functions have access to pertinent background information upon which to base their review and approval.

Document References:

EMS Document Control EP445.0001

Visual Aids EP445.0002

EMS Records Management EP453.0001

4.4.6 Operational Control:

Operational controls establish and maintain procedures for activities whose absence could lead to deviations from the site's environmental policy. Operational controls for Wilmington Assembly Plant's activities, products and services are ascertained through the identification of the significant environmental aspects & impacts and legal requirements. Documented controls are implemented through the site's EMS to instill the necessary operational control to cover situations where their absence could lead to deviations from the environmental policy or objectives and targets. As new activities, chemicals or modifications occur at the facility, the changes will be caught in the EMS and appropriate revisions and/or additional documentation will be incorporated.

Employees and onsite permanent contractors will be made aware of operational controls related to the Saturn of Wilmington Assembly Plant's EMS through awareness and job instruction training.

Visitors/ Visitor Contractors will be made aware of the plant's EMS and operational controls that may be pertinent to their activities through information cards.

Document References:

Saturn of Wilmington Assembly Plant Environmental Policy

Environmental Aspects EP431.0001

Legal and Other Requirements EP432.0001

Objectives and Targets EP433.0001

EMS Training EP442.0001

Capturing Changes That Could Impact the Environment EP446.0001

Visitor and Contractor Management EP446.0002

4.4.7 Emergency Preparedness and Response:

Wilmington Assembly Plant will establish and maintain procedures that prevent or mitigate emergency situations to reduce the environmental impact at the facility. Where practicable, the facility will test its existing emergency response programs. Emergency response programs are in place to educate and inform employees of ways to decrease the possibility of emergency situations and to teach them how to respond to accidents. In light of a facility or regulatory change or an accident or emergency situation at the Wilmington Assembly Plant, the necessary programs or procedures will be reviewed and revised, as appropriate.

Document References:

Legal and Other Requirements EP432.0001
Capturing Changes That Could Impact the Environment EP446.0001
Emergency Preparedness and Response EP447.0001

4.5 CHECKING AND CORRECTIVE ACTION:***4.5.1 Monitoring and Measuring:***

Wilmington Assembly Plant has a procedure that documents the method and responsibility to monitor and measure the operational criteria, and key characteristics of those operations and activities that demonstrate progress towards the site's objectives and targets as well as conformance to environmental laws and regulations.

Monitoring equipment that is associated with the measurement of key characteristics as referenced on departmental Key Monitorable Item (KMI) Datasheets will be maintained and calibrated. These records shall be retained.

The facility will periodically evaluate compliance with relevant environmental legislation and regulations through the use of the following established corporate programs.

Annually, the facility will evaluate compliance through the use of the EPR-SE (Environmental Performance Report - Self-Evaluation). This report is protected under the Attorney-Client Privilege. A signed certification statement will be retained to document the completion of the annual evaluation.

The facility will be visited periodically by a team of compliance auditors that are acting on behalf of GM Legal. A full compliance audit is conducted at this time. This process, and the documentation produced, is also protected under the Attorney - Client Privilege.

Programs are in place through the respective departments to ensure that the appropriate information is collected and maintained to track performance of the operational control.

Document References:

Legal and Other Requirements EP432.0001
Objectives and Targets EP433.0001
Monitoring and Measurement EP451.0001
Compliance Self-Assessment EP451.0002
EMS Records Management EP453.0001

4.5.2 Non-conformance, Corrective and Preventive Action:

Wilmington Assembly Plant has a procedure that documents the method and responsibility to identify, take immediate action to mitigate impacts, and subsequently investigate and propose corrective actions for environmental non-conformances. It also has provisions to initiate and implement preventive actions to prevent the occurrence of potential non-conformances.

Any corrective and preventive actions taken to eliminate the cause of non-conformance to the site's EMS will be implemented to the degree appropriate to the magnitude of the problem and correspond to the environmental impact encountered. Any resulting changes to procedures from corrective and preventive actions will be implemented and documented.

The operational staff member responsible for the department against which a non-conformity is written, is responsible to ensure closure of non-conformities. This operational staff member may designate someone within the department to mitigate the non-conformity through the implementation of corrective and preventive actions detailed on the Non-Conformity Notes (NCNs.)

Document References:

Environmental Non-conformance and Corrective and Preventive Action EP452.0001

4.5.3 Records:

Wilmington Assembly Plant has a procedure that documents the method and responsibility to maintain records necessary to demonstrate conformance to the requirements of the ISO 14001 standard. It specifies how to index and organize environmental records and facilitate their retrieval and protect them against loss or damage.

Records are retained in accordance with the GM Information Security Policy and Practices, pending any litigation or other holds that supersede documented requirements.

Document References:

EMS Records Management EP453.0001

4.5.4 EMS Audit:

Wilmington Assembly Plant has a procedure that documents the method and responsibility to establish a program, including scope, frequency, method, and reporting requirements, for conducting EMS audits.

EMS audits are planned and implemented to verify that environmental activities and related results comply with plans and procedures. The audit system is also used as a means to verify the effectiveness of the EMS.

The Lead Internal Auditor schedules internal audits. The audits are scheduled on the basis of status and environmental importance of the activity to be audited.

Audit results are recorded and brought to the attention of personnel having responsibility in the area audited. Personnel responsible for the area will take timely corrective action on deficiencies found during the audit. Follow-up audit activities verify and record the implementation and effectiveness of corrective action taken.

Document References:

Structure and Responsibility EP441.0001

Nonconformance and Corrective and Preventive Action EP452.0001

EMS Internal Audits EP454.0001

4.6 Management Review:

Wilmington Assembly Plant has a procedure that documents the method and responsibility to, at a minimum, annually conduct management reviews of the EMS to ensure its continuing suitability, adequacy and effectiveness. It specifies the information necessary to carry out the review. An agenda ensures that the management review considers the possible need for changes to the policy, objectives, other elements of the EMS in light of audit results, changing circumstances, and our commitment to continual improvement.

Management Review meetings are documented in the form of EMS Management Review Checklists. It is through the entire Management Review process that management is able to make decisions toward appropriate changes to the EMS and strive toward continual improvement of the system.

Document References:

Saturn of Wilmington Assembly Plant Environmental Policy

Objectives and Targets EP433.0001

Structure and Responsibility EP441.0001

Capturing Changes That Could Impact the Environment EP446.0001

Internal Audits EP454.0001

EMS Management Review EP460.0001